

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SEALED

UNITED STATES OF AMERICA,

Plaintiff,

v.

HAROLD LOVE SPRINGER, III,

Defendant.

CRIMINAL ACTION NO. 11- 80

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

(Possession of Child Pornography)

From on or about May 31, 2011, through on or about July 13, 2011, in the District of Delaware and elsewhere, the Defendant

HAROLD LOVE SPRINGER, III

did knowingly possess any computer disk and any other material that contained images of child pornography that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer; to wit, the Defendant did knowingly possess any computer disk that contained multiple computer files containing visual depictions of minors engaged in sexually explicit conduct, including but not limited to actual and simulated sexual intercourse, fellatio, masturbation, and the lascivious exhibition of the genitals and pubic area.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), and 2256(8)(A).

COUNT TWO

(Transportation of Child Pornography)

From on or about May 31, 2011, through on or about July 13, 2011, in the District of Delaware and elsewhere, the Defendant

HAROLD LOVE SPRINGER, III

did knowingly transport and ship using a means or facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce, by any means, including by computer, any child pornography; to wit, the Defendant did knowingly transport and ship multiple computer files containing visual depictions of minors engaged in sexually explicit conduct, including but not limited to actual and simulated sexual intercourse, bestiality, fellatio, masturbation and the lascivious exhibition of the genitals and pubic area.

All in violation of Title 18, United States Code, Sections 2252A(a)(1), 2252A(b)(1) and 2256(8)(A).

COUNT THREE

(Receipt of Child Pornography)

From on or about May 31, 2011, through on or about July 13, 2011, in the District of Delaware and elsewhere, the Defendant

HAROLD LOVE SPRINGER, III

did knowingly receive in interstate and foreign commerce by any means, including by computer, any child pornography and any material containing child pornography, that had been mailed and shipped and transported using a means or facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce, by any means, including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct and such visual

depictions were of such conduct; to wit, the Defendant did knowingly receive multiple computer files containing visual depictions of minors engaged in sexually explicit conduct, including but not limited to actual and simulated vaginal and anal intercourse, fellatio, masturbation, and the lascivious exhibition of the genitals and pubic area.

All in violation of Title 18, United States Code, Sections 2252A(a)(2), 2252A(b)(1) and 2256(8)(A).

NOTICE OF FORFEITURE

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(a)(1) and 2252A(a)(2) set forth in Counts One, Two and Three of this Indictment, the Defendant

HAROLD LOVE SPRINGER, III

shall forfeit to the United States of America, any property involved in such offense, or any property traceable to such property; and any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations. The property to be forfeited includes, but is not limited to, the following:

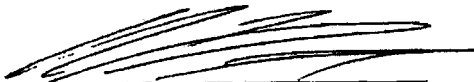
1. A Dell Studio XPS Desktop computer, Serial Number M8BPML1; and
2. A San Disk Cruzer 32 Megabyte thumb drive, Serial Number AO 79B393.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

CHARLES M. OBERLY, III
United States Attorney

BY:



Mark M. Lee
Assistant United States Attorney

Dated: August 2, 2011